



MICHAEL A. CARDODOZ
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

AMY N. OKEREKE
Assistant Corporation Counsel
(212) 788-9790
(212) 788-9776 (fax)
bokereke@law.nyc.gov

April 8, 2008

BY FAX

Fax: (212) 805-7917
Honorable Robert P. Patterson
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 4/9/08

Re: Paul Thompson v. City (Corporation Counsel), et al.
07 Civ. 2831 (RPP)

Your Honor:

MEMO ENDORSED

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants in the above referenced matter. In that capacity, I write in response to plaintiff's letter to the Court dated March 31, 2008, wherein plaintiff, who is proceeding *pro se*, requests that defendants be compelled to provide him with outstanding discovery.

On September 7, 2007, defendants served plaintiff with their responses and objections to Plaintiff's Interrogatories and Requests for the Production of Documents Pursuant to Local Civil Rule 33.2. Enclosed with these responses, defendants provided plaintiff with 272 pages of disclosures, which included, *inter alia*, plaintiff's infraction history, incident history, arrest report related to the incident, supplemental arrest report, use of force reports, intra-departmental memos concerning the incident, criminal court affidavits, and plaintiff's medical records. Plaintiff served his Second Request for Production of Documents on defendants on February 26, 2008. These responses were thus due on March 31, 2008. By overnight letter dated April 1, 2008, defendants informed plaintiff that they were still searching for information responsive to his requests and would provide responses to his requests by April 11, 2008.¹

¹ A copy of this letter is annexed hereto as Exhibit "A."

Pursuant to defendants' April 1, 2008 letter to plaintiff, defendants intend to produce documents responsive to plaintiff's requests, if any, by April 11, 2008, and respectfully request leave from the Court to respond by this date.

I thank the Court for its time and consideration herein.

Respectfully submitted,


Amy N. Okereke
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Paul Thompson, plaintiff *pro se*
07-A-2094
Great Meadow Correctional Facility
Box 51
Comstock, New York 12821-0051 (via first class mail)

*Application Granted
See order d
J. M. Palter L
05/8/08
4/8/08*

EXHIBIT A



MICHAEL A. CARDODOZ
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Assistant Corporation Counsel
(212) 788-9790
(212) 788-9776 (fax)
aokereke@law.nyc.gov

April 1, 2008

VIA OVERNIGHT MAIL

Paul Thompson, plaintiff *pro se*
07-A-2094
Great Meadow Correctional Facility
Box 51
Comstock, New York 12821-0051

Re: Paul Thompson v. City (Corporation Counsel), et al.
07 Civ. 2831 (RPP)

Dear Mr. Thompson:

Defendants are in receipt of plaintiff's Second Request for the Production of Documents, which were served on February 26, 2008 and therefore due on March 31, 2008. At this time defendants are still searching for information responsive to your requests and will provide responses to your requests by the end of the upcoming week, or by April 11, 2008. If you have any questions, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "AMN".
Amy N. Okereke
Assistant Corporation Counsel
Special Federal Litigation Division